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*Ramolete, E. Becerra, C. Mendoza, M. Felix,*  
*California Department of Corrections and*  
*Rehabilitation and Y. Abrego*

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA  
FRESNO DIVISION

**CHRISTINA WIND, et al.,**  
  
Plaintiff,  
  
v.  
  
**STATE OF CALIFORNIA, et al.,**  
  
Defendants.

Case No. 1:25-cv-00266-JLT-HBK

**SECOND STIPULATION REGARDING  
FILING OF FIRST AMENDED  
COMPLAINT; RESPONSE TO FIRST  
AMENDED COMPLAINT; AND TO  
RESET SCHEDULING CONFERENCE;  
[PROPOSED] ORDER**

Judge: Hon. Helena M. Barch-Kuchta  
Trial Date: None set  
Action Filed: March 3, 2025

Plaintiffs Wind, Cameron, Yancey, Clark, Monroe, Gutierrez, Salinas, Muhammad, De  
Leon Guererro, Randolph, Reyes, Manzano, and Milan (Plaintiffs) and Defendants State of  
California, California Department of Corrections and Rehabilitation (CDCR), De La Cruz,  
Arroyo, Mendoza, Ramolete, Becerra, Felix, and Abrego, by and through their attorneys of  
record, stipulate as follows.

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1           1.     Plaintiffs' complaint involves thirteen plaintiffs and nine defendants. It alleges  
2     multiple claims or causes of action arising out of an incident at the Central California Women's  
3     Facility that occurred on August 2, 2024. This incident allegedly involved about 159 inmates and  
4     multiple alleged uses of force by multiple defendants. (*See* Compl. ECF No. 1).

5           2.     Plaintiffs have filed proofs of service indicating that Defendants were served with a  
6     summons and the Complaint in this case on March 5, 2025. (ECF Nos. 5-13.)

7           3.     On March 25, 2025, a stipulation was filed extending Defendants' deadline for their  
8     initial responsive pleading to April 23, 2025, under Federal Rule of Civil Procedure 6 and Local  
9     Rule 144(a). (ECF No. 14.)

10          4.     On April 22, 2025, pursuant to the parties' stipulation, the Court extended the time  
11     for Defendants to respond to the complaint to May 23, 2025. (ECF Nos. 16-17).

12          5.     On May 21, 2025, pursuant to the parties' stipulation, the Court extended the time for  
13     Plaintiffs to file a first amended complaint to June 23, 2025, and reset the Initial Scheduling  
14     Conference, and filing of the parties' joint scheduling report to August 21, 2025 and August 14,  
15     2025 respectively. (ECF No. 20).

16          5.     Since May 21, 2025, Plaintiffs' counsel has prepared a proposed First Amended  
17     Complaint and submitted it to Defendants' counsel for consideration. In addition, Defendants'  
18     counsel is informed and believes that CDCR completed its investigation of the August 2, 2024,  
19     incident as of about June 20, 2025. However, Defendants' counsel believes that pertinent  
20     material necessary to fully assess Plaintiffs' claims and to respond to the allegations and claims  
21     will not be available to them for approximately sixty days, barring unforeseen delays.

22          6.     The parties met and conferred on June 20, 2025, discussed that additional time is  
23     needed for the parties to meet and confer on Plaintiffs' proposed amended complaint and that this  
24     case is not yet procedurally in a posture to allow the parties to meaningfully discuss a case  
25     schedule, provide initial disclosures, develop a discovery schedule, or consider whether this  
26     matter may be appropriate for early ADR. Thus, in consideration of the foregoing, and pursuant  
27     to Federal Rules of Civil Procedure 6 and 16, Local Rules 144 and 240, and this Court's order  
28

(ECF No. 2), the parties stipulate to and request the following:

a. The time for Plaintiffs to file a first amended complaint is extended to July 23, 2025.

b. Defendants' deadline to respond to the first amended complaint is set for August 22, 2025.

c. The scheduling conference set for August 21, 2025, is reset to September 18, 2025, and the parties' joint scheduling report shall be filed seven days before the conference.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD

Dated: June 23, 2025

Respectfully submitted,

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ALICIA BOWER  
Supervising Deputy Attorney General  
Jacqueline Kallberg  
Deputy Attorneys General

/s/ Arthur B. Mark III  
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*A. De La Cruz, V. Ramolete, Becerra, C.*  
*Mendoza, M. Felix and Y. Abrego*

Dated: June 23, 2025

LAW OFFICES OF ROBERT CHALFANT

/s/ Robert Chalfant  
Robert Chalfant  
*Attorney for Plaintiffs*  
*(as authorized June 19, 2025)*

**ORDER**

Good cause appearing, the parties' stipulation is GRANTED.

1. Plaintiffs shall file a first amended complaint on or before July 23, 2025;
2. Defendants' deadline to respond to any first amended complaint will be August 22, 2025; and
3. The scheduling conference set for August 21, 2025 is reset to September 18, 2025, and the parties' joint scheduling report shall be filed seven days before the conference.

IT IS SO ORDERED.

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Hon. Helena M. Barch-Kuchta

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